

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LINDA BEDELL *et al.*,

Plaintiffs,

v.

GEORGE HECKLER *et al.*,

Defendants.

Civil Action No. 2:20-cv-03804-WB

JOINT STATUS UPDATE

Plaintiffs and Defendants Topwater Investment Management LLC and Green Mountain Exclusive Fund, LLC (“Defendants”), by their respective counsel, hereby submit this Joint Status Update in response to this Court’s June 14, 2022 Order directing the parties to provide an update on the status of the case.

As of the date of this filing, the parties are engaged in discussions to determine whether this matter can be resolved outside of litigation. The parties were previously engaged in settlement discussions, but those discussions ended after one of Plaintiffs’ attorneys departed the firm. The parties have agreed that if they are unable to resolve this matter within thirty days, Defendants will consent to Plaintiffs filing an Amended Complaint and will stipulate to a mutually agreeable briefing schedule.

Dated: June 27, 2022

/s/ Ira Neil Richards

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